

1 KEVIN V. RYAN (CSBN 118321)
United States Attorney
2 JAY R. WEILL (CSBN 75434)
Assistant United States Attorney
3 Chief, Tax Division
4 CYNTHIA STIER (DCBN 423256)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102
6 Telephone: (415) 436-7000
6 Facsimile: (415) 436-6748

Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

WOODLAWN FOUNDATION.

Plaintiff,

V.

UNITED STATES OF AMERICA,

Defendant.

Case No. 06-3113-CRB

**PARTIES' STIPULATED
REQUEST TO EXTEND
DEADLINE TO RESPOND TO
COMPLAINT AND TO
CONTINUE CASE MANAGEMENT
CONFERENCE AND [PROPOSED]
ORDER**

IT IS HEREBY STIPULATED AND AGREED AND RESPECTFULLY

18 REQUESTED by and between the parties to this action, as reflected by the signatures of their
19 respective counsel as set forth below, that the deadline to respond to the complaint is extended
20 from July 17, 2006 to August 14, 2006, and the case management conference currently set for
21 August 18, 2006, at 8:30 a.m. be continued to September 8, 2006 at 8:30 a.m. The grounds for
22 this stipulated request are:

23 1. The Internal Revenue Service has requested additional time to obtain its
24 administrative records in this case. The requested records are necessary to meaningfully respond
25 to the allegations set forth in the complaint.

26 2. The case management conference currently scheduled for August 18, 2006.

27 Counsel for the United States has two court appearances scheduled on that date, at the same time.
28 Rescheduling the case management conference to September 8, 2006 would allow counsel for the

1 United States to appear at both.

2 Accordingly, the parties respectfully request that the Court continue the deadline to
3 respond to the complaint to August 14, 2006 and to continue the case management conference to
4 September 8, 2005, at 8:30 a.m.

5 Respectfully submitted,

6 CARR, McClellan, INGERSOLL,
THOMPSON & HORN

7 Dated: July 6, 2006

/s/ *Lage Anderson*
LAGE ANDERSON
Attorney for Plaintiff

10 KEVIN V. RYAN
11 United States Attorney

12 Dated: July 6, 2006

By: /s/ *Cynthia Stier*
CYNTHIA STIER
Assistant United States Attorney
Attorneys for the United States of America

15 **ORDER**

16 Pursuant to the Stipulation of the parties as set forth above, and for good cause shown,
17 **IT IS HEREBY ORDERED** that the deadline to respond to the complaint is extended
18 from July 17, 2006 to August 14, 2006.

19 **IT IS FURTHER HEREBY ORDERED** that the case management conference date
20 currently scheduled for August 18, 2006, at 8:30 a.m. is continued to September 8, 2006, at
21 8:30 a.m.

23 Dated: Juy 7, 2006

24 THE HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE

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